

## REMARKS

The prior art rejections of the claims are again respectfully traversed, for the reasons given in the Remarks to the Amendment filed December 17, 2001, which Remarks are incorporated herein by this reference. The reasons for the rejections given in the current Office Action are not well understood, so preparing a response to them has been difficult. Therefore, the Examiner is requested to let the undersigned attorney know when she reaches this Amendment (being filed with an RCE) for action so that a telephone interview can be scheduled. It is believed that a telephone interview can be very productive in moving forward the prosecution of this application. The undersigned's direct dial telephone number is 415-217-6293.

The grounds of the rejection of claims 1-9 and 16-21 under 35 U.S.C. §102(b) over U.S. patent no. 5,486,687 ("Le Roux") has been the most difficult to understand. For example, it appears that the card 10 of Le Roux is considered in paragraph 3 of the Office Action to satisfy both of the mutually exclusive claim limitations of cards that conform to the first and second card standards. However, a few clear errors can be pointed out that are believed to exist in the Office Action's characterization of Le Roux upon which the rejection appears to be based.

One such error is that a card (it is not said whether card 10 or 18), when inserted into the receptacle 30, makes electrical contact with contacts 16 on the card. It is noted that contacts 16 of the cards 10 and 18 (same reference number 16 used for both) clearly contact each other to provide communication between the two cards and are not contacted by electrical contacts of the receptacle 30. Further, it is believed incorrect to say that Le Roux describes a SD card, a public standard that was established long after Le Roux. The SD card standard is expressed in claims 2-6.

Perhaps most important, no disclosure that "the security code stored in the card 18 is accessible through the card contacts 12" has been found in Le Roux, contrary to what is said in paragraph 3 of the Office Action. Rather, Le Roux appears to emphasize that the security code is *not* accessible from outside of the cards. See, for example, column 5, lines 40-49. The security code in the card 18 is used in processing internal to the two cards to authenticate access by users who input their security code to the card 10. If the security code of the card 18 could be read through the external contacts of the card 10,

there would no longer be any security. For these reasons, it is respectfully submitted that the rejection of claims 1-9 and 16-21 as anticipated by Le Roux is based upon an incorrect characterization of the disclosure of that reference.

Claims 10 and 14-15 have been rejected under 35 U.S.C. §103(a) over a combination of Le Roux and U.S. patent no. 5,278,395 ("Benezet"). Since this rejection relies upon the earlier rejection over Le Roux as a starting point, the same difficulties described above appear to exist. In addition, the separation of Le Roux's security card 18 from the memory card 10 to sequentially insert them into a single card receptacle of an electronic device, as alleged in the Office Action to be obvious, would result in the circuits of the two cards no longer working together through their contacts 16. Claim 10 specifies use of a security card to enable operation of the *electronic device* with a subsequently connected second card, while Le Roux uses its security card 18 to enable operation of the second card 10. The strong and consistent disclosure in Le Roux of the two cards being used together runs counter to the separation specified by claims 10, 14 and 15. Further, no mention of the features added by the dependent claims 14 and 15 has been noted in the Office Action, and no disclosure of those methods has been noted in the cited references.

Claims 11-13 and 24 have been rejected under 35 U.S.C. §103(a) over a combination of Le Roux, Benzet and U.S. patent no. 6,002,605 ("Iwasaki"). Again, this rejection is based upon the earlier allegations of how Le Roux applies to the claims, which are not fully understood and believed based on an erroneous characterization of Le Roux, as explained above. But it can be said that Benzet's lack of suggesting the separate use of Le Roux's two cards, as set forth in the preceding paragraph, is not provided by Iwasaki, so dependent claims 11 and 12 are considered to be patentable for the same reasons given in the preceding paragraph for independent claim 10. The rejection of claim 13 (p. 4, last para.) appears to be based upon facts of which Official Notice has been taken, to which an objection is lodged. The citation of evidence that the admitted difference over the cited references is obvious is requested. Lastly, independent claim 24 recites sound apparatus that operates with the same sequential security and sound card insertions that is respectfully submitted not to have been obvious over the cited references.

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899395 v1

Application No.: 09/633,089

Claims 22 and 23 have been rejected under 35 U.S.C. §103(a) over Iwasaki and U.S. patent no. 6,010,066 ("Itou"). It is respectfully submitted that Iwasaki has not been properly characterized in the Office Action. The two circuits that are claimed to be connected to a common card receptacle are said to exist in Iwasaki as elements 51 and 56. But element 51 is stated to be a connector (Iwasaki, col. 13, ln. 51), and element 56 stated to be either a system bus (Iwasaki, col. 13, lns. 46 & 56) or a connector (col. 13, ln. 50). The referenced disclosure of Iwasaki (Figures 15A, 15B & 17) includes an apparatus 30 with two card slots, as described with respect to Figure 5. Itou's system with a single card slot accepts only one type of card, a money IC card. Substitution of the single card slot device of Itou for the two-card slot device of Iwasaki would have taken Iwasaki a step backward. Iwasaki's focus is on the two-card slot device. But the main point here is that, even if Iwasaki and Itou are combined, there is no suggestion of separate circuits connected to the single receptacle to handle the security code and to receive data, as recited in claims 22 and 23.

New claims 25 and 26 specifically define the structure of a card containing elements of two different card standards that share a common set of contacts according to one of the card standards, as described in the present application with respect to the example of Figure 7. Claims 25 and 26 are believed to be patentable for this reason. New claim 27 includes the card of claim 25 with the addition of a cooperative socket for the card in a device that includes security and data processing circuits connected to the socket. Consideration of these new claims is respectfully requested.

#### Information Disclosure Statement

A Supplemental Disclosure Statement is being filed herewith that includes references appearing in a Search Report of a corresponding PCT application that was issued by the European Patent Office. Consideration of these additional references, and making them of record in the file of the present application, are respectfully requested.

#### Conclusion

As also requested at the beginning of these Remarks, the early scheduling of a telephone interview with the Examiner is requested. The undersigned attorney would

appreciate a telephone call (at 415-217-6293) from the Examiner when it is convenient for her to schedule such a telephone interview.

**EXPRESS MAIL NO.:**  
**EV212982329US**

Respectfully Submitted,



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**APPENDIX: TEXT OF ALL APPLICATION CLAIMS AFTER AMENDMENT**

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1. An electronic card that is removably insertable into a receptacle which makes electrical contact with contacts on the card, wherein a physical shape of the card and an arrangement of the contacts conform with a first published card standard, while an electrical interface through the contacts conforms to a second published card standard, the first and second card standards specifying incompatible physical card shapes, arrangements of contacts and electrical signal interfaces.

2. The card according to claim 1, wherein the first card standard is that of the MMC or SD Card, while the second card standard is an ISO/IEC 7816 standard.

3. The card according to claim 2, wherein the card omits having an electrical signal interface at said contacts according to the first card standard.

4. The card according to claim 3, wherein data of a security code is stored in the card in a manner to be accessible through the card contacts according to the electrical interface of the second card standard.

5. The card according to claim 2, wherein the card additionally includes an electrical signal interface at said contacts according to the first card standard.

6. The card according to claim 5, wherein the card includes data stored therein of a security code that is accessible through the card contacts according to the electrical interface of the second card standard, and additionally includes content data stored therein that is accessible through the card contacts according to the electrical interface of the first card standard, wherein the security code is adapted for use in enabling utilization of the content data.

7. A method using removable data memory cards, comprising:

providing a first card having a physical shape, arrangement of electrical contacts and an electrical interface through the contacts according to a first published card standard,

providing a second card having a physical shape and an arrangement of electrical contacts according to the first card standard and an electrical interface through the contacts according to a second published card standard, wherein the first and second card standards specify incompatible physical card shapes, arrangements of contacts and electrical signal interfaces,

inserting the first and second cards into at least one receptacle that electrically engages their contacts according to the arrangement of electrical contacts of the first card standard,

reading data stored in the first and second cards through a system electrically connected with the receptacle, and

utilizing the data read from the first and second cards by the system in a cooperative manner.

8. The method according to claim 7, wherein the data stored in the second card is a security code that is utilized by the system to enable utilization of data read from the first card.

9. The method according to either of claims 7 or 8, wherein the first card standard is of either the MMC or SD Card, and the second card standard is an ISO/IEC 7816 standard.

10. A method of operating an electronic device, comprising:  
inputting a security code to the electronic device by inserting a first non-volatile memory card into a receptacle of the device on which the security code is stored,  
comparing the inputted security code with a security code stored in a non-volatile manner within the device, and, if the security codes compare, enabling operation of the electronic device,

after inputting the security code from the first card, removing said first card from the receptacle,

thereafter inputting data to the electronic device that is utilized in the operation thereof by inserting a second non-volatile memory card into said receptacle on which the data is stored, and

thereafter operating the enabled electronic device with the use of said data.

31  
11. The method of claim 10, wherein the data inputted to the electronic device include audio data that is utilized by the device to generate sounds.

12. The method of claim 11 wherein the sounds that are generated include music.

13. The method of claim 11 wherein the electronic device includes a sound system installed in a vehicle.

14. The method of claim 10 wherein the electronic device includes a global positioning system and the data inputted to the electronic device includes global positioning data.

15. The method of claim 10 wherein the electronic device includes a portable electronic device and the data inputted to the electronic device include a program for at least in part operating the device.

16. An electronic device, comprising:  
at least one receptacle into which a first electronic card having a shape and arrangement of contacts of a first published card standard is removably insertable to form an electrical connection between the contacts of the card and the device but wherein a second electronic card having a shape and arrangement of contacts of a second published card standard is not operatively insertable into the receptacle to make said connection, and

wherein the first card includes electronic functions and an electrical interface through its said contacts according to the second card standard that are distinct from electronic functions and an electrical interface of the first card standard.

17. The device according to claim 16, wherein the first card standard is that of the MMC or SD Card, while the second card standard is an ISO/IEC 7816 standard.

18. The card according to claim 17, wherein the first card omits having an electrical signal interface at said contacts according to the first card standard.

19. The card according to claim 18, wherein data of a security code is stored in the first card in a manner to be accessible by the device through the first card contacts according to the electrical interface of the second card standard.

20. The card according to claim 17, wherein the first card additionally includes an electrical signal interface at said contacts according to the first card standard.

21. The card according to claim 20, wherein the first card includes data stored therein of a security code that is accessible by the device through the first card contacts according to the electrical interface of the second card standard, and additionally includes content data stored therein that is accessible through the first card contacts according to the electrical interface of the first card standard, wherein the security code is adapted for use in enabling utilization of the content data.

22. An electronic device, comprising:  
an electronic system that performs at least one designated function,  
a stored security code,  
a receptacle into which at least one type of non-volatile memory card is removably insertable,  
a circuit connected to said receptacle to receive a security code from a memory card inserted into said receptacle and enable the electronic system to perform said at least



one designated function when the received security code matches the stored security code, and

another circuit connected to said receptacle to receive data from a memory card inserted into said receptacle and supply that data to the electronic system for use in the performance of said at least one designated function.

23. The electronic device of claim 22, additionally comprising first and second memory cards, said first card containing the security code and the second card containing the data.

24. Sound apparatus, comprising:  
at least first and second memory cards that each have a given physical format and pattern of electrical contacts from which data stored therein can be read, and  
an audio unit for installation in a vehicle, including:

an audio amplifier,

a slot to receive insertion of one of the memory cards at a time and  
contact the given pattern of electrical contacts of an inserted memory card,

a security circuit that enables operation of the audio unit in  
response to a specific security code for the radio, and

a card interface circuit connected with the slot to provide a security  
code to the security circuit and audio data to the audio amplifier according  
to data contained on a card inserted in the slot,

said first memory card containing security code data to which the security circuit  
responds and the second memory card containing audio data to which the audio amplifier  
responds to reproduce sound according to the audio data.

25. (New) An electronic card, comprising:

an external physical shape and an arrangement of electrical contacts on an outside  
surface of the card according to a first published card standard,

at least a first integrated circuit chip enclosed in the card that is electrically  
connected with the external contacts according to the first published card standard in

order to provide non-volatile storage of data passing through at least one of the external card contacts,

at least a second integrated circuit chip enclosed in the card that implements a second published card standard specifying an external physical shape and an arrangement of electrical contacts on an outside surface of a card that are different from those of the first published card standard and which provides a security function, and

wires connecting the second integrated circuit chip to common ones of the external card pins to which the first integrated circuit chip is connected in order to provide for access of said security function therethrough.

26. (New) The electronic card of claim 25, wherein the first published card standard is one of MMC or SD cards and the second published card standard is ISO/IEC 7816.

27. (New) An electronic card system, comprising:

(1) an electronic card, including:

an external physical shape and an arrangement of electrical contacts on an outside surface of the card according to a first published card standard,

at least a first integrated circuit chip enclosed in the card that is electrically connected with the external contacts according to the first published card standard in order to provide non-volatile storage of data passing through at least one of the external card contacts,

at least a second integrated circuit chip enclosed in the card that implements a second published card standard specifying an external physical shape and an arrangement of electrical contacts on an outside surface of a card that are different from those of the first published card standard and which provides a security function, and

wires connecting the second integrated circuit chip to common ones of the external card pins to which the first integrated circuit chip is connected in order to provide for access of said security function therethrough, and

(2) a utilization device for the card, including:

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a socket for removably receiving the card and having contacts that connect with the external card contacts when the card is inserted into the socket,

first electronic utilization circuits connected to the socket contacts that operate the card to store data therein, and

second electronic utilization circuits connected to the socket contacts that operate the security function of the card.